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27 **UNITED STATES DISTRICT COURT
28 NORTHERN DISTRICT OF CALIFORNIA
29 SAN JOSE DIVISION**

30 CHASOM BROWN, WILLIAM BYATT,
31 JEREMY DAVIS, CHRISTOPHER
32 CASTILLO, and MONIQUE TRUJILLO
33 individually and on behalf of all similarly
34 situated,

35 Plaintiffs,

36 v.

37 GOOGLE LLC,

38 Defendant.

39 Case No. 4:20-cv-03664-YGR-SVK

40 **JOINT STIPULATION AND [PROPOSED]
41 ORDER RE: GOOGLE'S PRODUCTION
42 OF DASHBOARD DATA AND
43 PLAINTIFFS' DAMAGES EXPERT
44 REPORT**

45 Judge: Honorable Yvonne Gonzalez Rogers

1 Pursuant to Civil Local Rules 6-2 and 7-12, this joint stipulation is entered into between
2 Plaintiffs and Defendant Google LLC (“Google”), collectively referred to as the “Parties.”

3 WHEREAS, in response to the Court’s March 15, 2022 Order on Dispute P27 (Dashboard
4 Data) (Dkt. 487), Google made a production to Plaintiffs on March 24, 2022;

5 WHEREAS, following a meet-and-confer, Google committed to supplementing that
6 production;

7 WHEREAS, Google will complete that supplemental production by April 15, 2022;

8 WHEREAS, one of Plaintiffs’ experts (“Plaintiffs’ Damages Expert”) wishes to review the
9 data from this supplemental production prior to submitting his report;

10 WHEREAS, the parties have agreed that Plaintiffs’ Damages Expert may have one
11 additional week to complete his report, making it due on April 22, 2022 instead of April 15, 2022;

12 WHEREAS, the Parties will serve opening expert reports from all other experts on April 15,
13 2022, as currently scheduled;

14 WHEREAS, the parties have agreed that Google will have one additional week to serve any
15 rebuttal report to Plaintiffs’ Damages Expert’s report, making Google’s deadline to rebut that report
16 May 27, 2022 instead of May 20, 2022.

17 WHEREAS, the parties agree that any opening expert reports served by Google will not be
18 shared with Plaintiffs’ Damages Expert until his report is served to Google;

19 WHEREAS, the parties agree that any rebuttal expert reports served by Plaintiffs’ experts
20 on May 20, 2022 will not be shared with any Google expert submitting a rebuttal report to Plaintiffs’
21 Damages Expert until that rebuttal report(s) has been served by Google to Plaintiffs.

22 NOW THEREFORE, the Parties stipulate as follows:

23 1. The deadline for Plaintiffs’ Damages Expert to serve his opening expert report is moved
24 from April 15, 2022 to April 22, 2022.

25 2. The deadline for Google to serve any rebuttal reports to Plaintiffs’ Damages Expert’s
26 report is moved from May 20, 2022 to May 27, 2022.

27 3. The parties will otherwise serve expert reports on April 15, 2022 and May 20, 2022, as
28 currently scheduled (Dkt. 521)

1 4. All other case deadlines remain in effect.
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DATED: April 14, 2022

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5 SULLIVAN, LLP

6 /s/ Viola Trebicka

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1 **ATTESTATION OF CONCURRENCE**
2

3 I am the ECF user whose ID and password are being used to file this Stipulation. Pursuant
4 to Civil L.R. 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in
5 the filing of this document.
6

7 Dated: April 14, 2022

8 By /s/ Amanda Bonn
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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION**

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

V.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

[PROPOSED] ORDER

Judge: Honorable Yvonne Gonzalez Rogers

PURSUANT TO STIPULATION, IT IS SO ORDERED

DATED: _____, 2022

Hon. Yvonne Gonzalez Rogers
United States District Judge